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16 Attorneys for Plaintiffs

17  
18 UNITED STATES DISTRICT COURT  
19 FOR THE NORTHERN DISTRICT OF CALIFORNIA

20  
21 MARK AARON HAYNIE, BRENDAN  
22 JOHN RICHARDS, THE CALGUNS  
23 FOUNDATION, INC., and THE  
24 SECOND AMENDMENT  
25 FOUNDATION, INC.,

26 Plaintiffs,

27 vs.

28 KAMALA HARRIS, Attorney General  
of California, CALIFORNIA  
DEPARTMENT OF JUSTICE, CITY  
OF ROHNERT PARK, and OFFICER  
DEAN BECKER (RP134)

29 Defendants.

30 Case No.: 3:10-CV-01255 SI

31 STIPULATION and JOINT  
32 ADMINISTRATIVE MOTION and  
~~PROPOSED ORDER~~  
33 Re: Case Management

34 CURRENT CMC: JUNE 21, 2013

35 PROPOSED CMC: SEPTEMBER 6, 2013

36 IT IS HEREBY STIPULATED by and between the parties hereto through  
37 their respective attorneys of record that the pending Case Management Conference  
38 currently set for June 21, 2013 in Courtroom 10, 19<sup>th</sup> Floor of the U.S. District  
39 Court for the Northern District of California should be reset.

40 The Rohnert Park Defendants and the Plaintiffs are still engaged in earnest  
41 self-directed settlement discussions.

1        If a settlement can be reached, then the remaining parties (California  
 2 Department of Justice and the Plaintiffs) will proceed with setting hearing dates for  
 3 dispositive motions at the next Case Management Conference.

4        Furthermore, the Plaintiffs and the California Department of Justice are  
 5 aware that several bill have been introduced in the State Legislature that may  
 6 moot this case or require amendments to the pleadings. Several of those bills have  
 7 passed at least one legislative house and are pending in the other. Those parties  
 8 may seek another continuance and/or stay to conserve resources of the parties and  
 9 the Court.

10      The parties propose that the Court reset the Case Management Conference to  
 11 September 6, 2013 in order to give the parties engaged in settlement discussions  
 12 the time necessary to conclude that process or to request formal ADR assistance  
 13 from the Court.

14 **SO STIPULATED.**

15 Date: June 14, 2013

Date: June 14, 2013

16      /s/  
 17 Mark Beckington  
 18 Supervising Deputy Attorney General  
 19 for Ross Moody,  
 20 Counsel for Defendants  
 21 Harris & California Dept. of Justice

/s/  
 Donald Kilmer  
 Counsel for Plaintiffs

22 Date: June 14, 2013

23      /s/  
 24 Robert W. Henkels  
 25 Counsel for Defendants  
 26 City of Rohnert Park & Becker

27      **ATTESTATION FOR COMPLIANCE WITH GENERAL ORDER 45 AND  
 28 LOCAL RULE VIII.B.**

29      I, Donald Kilmer, declare under penalty of perjury under the laws of California  
 30 and the United States that I have in my possession e-mail correspondence from  
 31 Ross Moody, and Robert Henkels that the content of this document is acceptable to  
 32 all persons required to sign the document. I declare that this document was signed  
 33 in San Jose, CA on June 14, 2014.

34      /s/  
 35 Donald Kilmer, Attorney for Plaintiffs

## ORDER

The Case Management Conference currently set for June 21, 2013 is reset to:  
(Date) 9/6/13, at (Time): 3:00 p.m., in Courtroom 10,  
19<sup>th</sup> Floor of the U.S. District Court for the Northern District of California – San  
Francisco. A Joint Case Management Conference Statement shall be filed seven (7)  
calendar days before the new date.

7 || Date: 6/17/13

Susan Illston  
United States District Judge

## United States District Judge

No further continuances will be granted.